

Virginia Stationary Source Operating Permit (Title V)

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

| <u>Permit Number</u> | <u>Effective Date</u> | <u>Expiration Date</u> |
|----------------------|-----------------------|------------------------|
| SWRO10509 | April 30, 2001 | April 30, 2006 |

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

American of Martinsville
Chilhowie Plant
P.O. Box 5071
Martinsville, VA 24112
Registration No. 10509
County-Plant No. 173-0067

located at

355 Industrial Park Road
Chilhowie, VA 24319

in accordance with the Conditions of this permit.

Approved on April 30, 2001.

Dennis H. Treacy
Director

Permit consists of 34 pages.
Permit Conditions 1 to 83.

**American of Martinsville – Chilhowie Plant
Title V Operating Permit Table of Contents**

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PERMIT CONDITIONS - the regulatory reference and authority for each condition is listed in parentheses () after each condition.

Operate in Accordance with Permit

1. The permitted facility is to be operated in accordance with the terms of this permit. You are also advised that the conditions of the Department's permit dated October 28, 1999 (as amended September 19, 2000) are still valid. This permit is subject to revocation prior to its expiration date if the permittee fails to comply with the terms and conditions of the permit, any applicable federal or state requirements as defined in 9 VAC 5 Chapter 80 Article 1 or any provisions of 9 VAC 5 Chapter 80 Article 1. Any physical change in, or change in the method of operation of, the stationary source subject to this permit may be subject to 9 VAC 5-80-10, 9 VAC 5-80-1790, 9 VAC 5-80-30, or 9 VAC 5-80-50 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-260 and 9 VAC 5-80-190)

Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

- a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is the potential of, a resulting emissions increase;
- b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;
- c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emission cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
- d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
- e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
- f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
- g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and by 9 VAC 5-80-720 B. and C.

If there is any change made at the permitted facility which requires a new permit or a permit modification under 9 VAC 5-80-10, 9 VAC 5-80-1790, 9 VAC 5-80-30, it may be necessary to reopen this permit under 9 VAC 5-80-110 to ensure that applicable requirements continue to be met.
(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260.)

2. Equipment to be operated consists of:

Significant Emissions Units

| Emission Unit ID | Emission Unit Description | Capacity/ Size | Pollution Control Device (PCD) | PCD ID | Applicable Permit Date |
|---|---|---|---|-------------|------------------------|
| Fuel Burning Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified) | | | | | |
| 01 | Bigelow boiler Model 2495 Woodwaste-fired (1973) | 35,700,000 Btu/hr | Two multiclones In series | CD01 | 9/19/2000 |
| 02 | Cleaver Brooks CR-100-700 Gas-fired boiler (1973) | 29,300,000 Btu/hr | | | 9/19/2000 |
| Woodworking Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified) | | | | | |
| 03 | Woodworking | 7,425,000 bd. ft./yr and 848 bd. ft./hr total | Two Pneumafil and 4 Carter Day Baghouses, then to 2 cyclones. | CD02 - CD09 | 9/19/2000 |
| Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 40 (Existing) | | | | | |
| 04 | Spray booths (total of 15) | 1016 tons/yr & 0.12 ton/hr VOC | Spray booth filter (as noted below) | | N/A |
| | Sap Stain (2 HVLP guns) | 28.1 gal/hr (max) | Filters | | N/A |
| | First Stain (2 HVLP) | 28.1 gal/hr (max) | Filters | | N/A |
| | Second Stain (2 HVLP) | 28.1 gal/hr (max) | Filters | | N/A |
| | Wash Coat (2 airless guns) | 68.4 gal/hr (max) | Filters | | N/A |
| | Filler (2 HVLP) | 28.1 gal/hr (max) | Filters | | N/A |
| | Back Spray (2 HVLP) | 28.1 gal/hr (max) | Filters | | N/A |
| | Sealer (2 airless) | 68.4 gal/hr (max) | Filters | | N/A |
| | Glaze (2 HVLP) | 28.1 gal/hr (max) | Filters | | N/A |
| | First Lacquer (2 airless) | 68.4 gal/hr (max) | Filters | | N/A |
| | Shade (2 HVLP) | 28.1 gal/hr (max) | Filters | | N/A |
| | Second Lacquer (2 airless) | 68.4 gal/hr (max) | Filters | | N/A |
| | Third Lacquer (2 airless) | 68.4 gal/hr (max) | Filters | | N/A |
| | Repair (1 airless) | 34.2 gal/hr (max) | Filters | | N/A |
| | Basecoat-Edgefill (2 HVLP) | 28.1 gal/hr (max) | Filters | | N/A |

| Emission Unit ID | Emission Unit Description | Capacity/ Size | Pollution Control Device (PCD) | PCD ID | Applicable Permit Date |
|---|--|------------------------------|--------------------------------|--------|------------------------|
| | Drawer Coating (1 HVLP) | 14 gal/hr (max) | Filters | | N/A |
| | Geo Koch/Rhodes ovens (4) | Steam-heated | | | N/A |
| | One Foust Dip Tank | | | | N/A |
| Basecoat, Print and Topcoat Line Subject to 9 VAC 5 Chapter 50 (New or Modified) | | | | | |
| 05 | Roller head applicators and 2 spray booths noted below | 39.1 tons/yr & 53 lb/hr VOC | | | 9/19/2000 |
| | Print Line Spray #1 and #2 (1 HVLP each booth) | 28.1 gal/hr (max) (combined) | Filters | | 9/19/2000 |
| | Washoff tank | 14 cubic feet | | | N/A |
| Fritz and Denmark (Burkleson) Veneer Presses Subject to 9 VAC 5 Chapter 50 (New or Modified) | | | | | |
| 06 | Veneer presses | 231 lb/hr resin | | | 9/19/2000 |

Insignificant Emissions Units

The following emission units at the facility are identified in the application as being subject to 9 VAC 5-40-80 (visible emissions) and 9 VAC 5-40-260 (particulate process weight rate table), and are listed as insignificant emission units in 9 VAC 5-80-720 A, 9 VAC 5-80-720 B, or 9 VAC 5-80-720 C:

| Emission Unit ID | Emission Unit Description | Capacity/ Size | Applicable Requirement ** |
|--|---|---------------------------------|----------------------------|
| Insignificant equipment or activities | | | 9 VAC 5-80-720 A |
| 07 | Diesel engine for fire pump | 185 horsepower | 9 VAC 5-40-80 |
| Insignificant equipment or activities | | | 9 VAC 5-80-720 B or C |
| 08 | Storage tank for diesel fuel | 275 gallons | 9 VAC 5-40-80 |
| 09 | Natural gas heater for Fritz press heater | 1.14 x 10 ⁶ Btu/hr | 9 VAC 5-40-80 |
| 10 | Four wood drying kilns (steam-heated) | 10.5 million bd. ft./yr (total) | 9 VAC 5-40-80 and 5-40-260 |
| 11 | Six storage tanks | 4000 gallons each | 9 VAC 5-40-80 and 5-40-260 |

** Applicable requirements:

9 VAC 5-40-80 (visible emissions)

9 VAC 5-40-260 (particulate process weight rate table)

These emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. Provided, however, that one or more of the emission units identified above shall be subject to monitoring, recordkeeping, and reporting requirements pursuant to 9 VAC 5-80-110 if, in the Director's determination, operation of the emission unit(s) indicates a failure to comply with 9 VAC 5-40-80 or 9 VAC 5-40-260. The Director shall permit revision proceedings in accordance with 9 VAC 5-80-190 through 9 VAC 5-80-240, as appropriate, to impose specific permit conditions upon such noncomplying emission unit(s). (9 VAC 5-40-80, 9 VAC 5-40-260, 9 VAC 5-80-110 and 9 VAC 5 Chapter 80 Article 4)

Fuel Burning Conditions (Bigelow Boiler (01) and Cleaver Brooks Boiler (02))

Emission Control

3. Particulate emissions from the Bigelow boiler (01) stack shall be controlled by two multicyclones in series. The multicyclones shall be provided with adequate access for inspection. An annual inspection shall be conducted on the multicyclones by the permittee to insure structural integrity.
(9 VAC 5-80-110 C, 9 VAC 5-50-260 and condition 6 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Limitations

4. The approved fuel for the Bigelow boiler (01) is woodwaste generated from the manufacturing processes of sources with SIC 2511. The approved fuel for the Cleaver Brooks boiler (02) is natural gas. A change in fuels may require a permit to modify and operate.
(9 VAC-5-80-10, 9 VAC 5-80-110 B and condition 14 of NSR permit issued 10/28/99 (as amended 9/19/2000))
5. The Bigelow boiler (01) shall consume no more than 6,000 tons of woodwaste per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC-5-80-10, 9 VAC 5-80-110 B and condition 15 of NSR permit issued 10/28/99 (as amended 9/19/2000))
6. The Cleaver Brooks boiler (02) shall consume no more than 48,800,000 cubic feet of natural gas per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC-5-80-10, 9 VAC 5-80-110 B and condition 16 of NSR permit issued 10/28/99 (as amended 9/19/2000))
7. Emissions from the operation of the Bigelow boiler (01) shall not exceed the limits specified below:

| | | |
|--------------------|-------------|--------------|
| Particulate Matter | 9.30 lbs/hr | 7.20 tons/yr |
| PM-10 | 1.90 lbs/hr | 2.90 tons/yr |

| | | |
|-------------------------------|--------------|---------------|
| Sulfur Dioxide | 48.40 lbs/hr | 23.90 tons/yr |
| Nitrogen Dioxide | 21.70 lbs/hr | 12.60 tons/yr |
| Carbon Monoxide | 10.70 lbs/hr | 15.80 tons/yr |
| Volatile Organic Compounds | 3.80 lbs/hr | 4.30 tons/yr |

These emissions are derived from the estimated overall emission contribution from operating limits and emission factors. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 4 and 5, or as demonstrated by performance test. Annual emissions shall be calculated as the sum of each consecutive twelve (12) month period.

(9 VAC 5-50-260, 9 VAC 5-80-110 B and condition 19 of NSR permit issued 10/28/99 (as amended 9/19/2000))

8. Toxic pollutant emissions from the operation of the Bigelow boiler (01) shall not exceed the limits specified below:

| | | |
|-----------|---------------|----------------|
| Mercury | 0.0006 lbs/hr | 0.0003 tons/yr |
| Nickel | 0.0234 lbs/hr | 0.0113 tons/yr |
| Arsenic | 0.0095 lbs/hr | 0.0046 tons/yr |
| Cadmium | 0.0011 lbs/hr | 0.0005 tons/yr |
| Chromium | 0.0324 lbs/hr | 0.0156 tons/yr |
| Copper | 0.0211 lbs/hr | 0.0102 tons/yr |
| Vanadium | 0.0021 lbs/hr | 0.0010 tons/yr |
| Selenium | 0.0030 lbs/hr | 0.0014 tons/yr |
| Beryllium | 0.0016 lbs/hr | 0.0008 tons/yr |
| Aldehydes | 0.1444 lbs/hr | 0.1617 tons/yr |

These emissions are derived from the estimated overall emission contribution from operating limits and emission factors. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 4 and 5, or as demonstrated by performance test. Annual emissions shall be

calculated as the sum of each consecutive twelve (12) month period.

(9 VAC 5-50-260, 9 VAC 5-50-180, 9 VAC 5-80-110 B and condition 20 of NSR permit issued 10/28/99 (as amended 9/19/2000))

9. Total emissions from the operation of Cleaver Brooks boiler (02) shall not exceed the limits specified below:

| | | |
|--|--------------|---------------|
| Sulfur Dioxide | 15.00 lbs/hr | 12.57 tons/yr |
| Nitrogen Oxides (as NO ₂) | 4.18 lbs/hr | 3.50 tons/yr |
| Carbon Monoxide | 1.05 lbs/hr | 0.90 tons/yr |

These emissions are derived from the estimated overall emission contribution from operating limits and emission factors. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 4 and 6, or as demonstrated by performance test. Annual emissions shall be calculated as the sum of each consecutive twelve (12) month period.

(9 VAC 5-50-260, 9 VAC 5-80-110 B and condition 18 of NSR permit issued 10/28/99 (as amended 9/19/2000))

10. Visible emissions from the Cleaver Brooks boiler (02) stack shall not exceed 10 percent opacity except for one six-minute period in any one hour in which visible emissions shall not exceed 20 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-50-260, 9 VAC 5-80-110 K and condition 27 of NSR permit issued 10/28/99 (as amended 9/19/2000))
11. Visible emissions from the Bigelow boiler (01) stack shall not exceed 20 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260, 9 VAC 5-80-110 K and condition 28 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Monitoring

12. Visible emissions checks shall be performed on the Cleaver Brooks and Bigelow boiler stacks, when operating, for compliance with limits on visible emissions as specified in conditions 10 and 11 above. Visible emissions checks shall be conducted at least weekly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions using 40 CFR 60 Appendix A, Method 22. If visible emissions are observed during these weekly observations, or at any other time, visible emissions evaluations in accordance with 40 CFR 60 Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If any of the observations exceed twenty percent (20%), the VEE shall be conducted for a total of sixty (60) minutes. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit

is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.

(9 VAC 5-50-20 and 9 VAC 5-80-110 K)

13. As part of the periodic monitoring requirement set forth in 9 VAC 5-80-110 E, emission tests shall be conducted on the Bigelow boiler exhaust for particulate matter and carbon monoxide (in accordance with EPA methods) to determine compliance with the limit contained in condition 7 for the same. The test shall be performed once per permit term, within 120 days of permit issuance. Source emission tests shall be conducted and data reported in accordance with the Source Test Report Format attached to this permit, 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or Subpart listed in 9 VAC 5-50-410. The details of the source emission tests are to be arranged with the Director, Southwest Regional Office. Two (2) copies of the test results shall be submitted to the Southwest Regional Office within 60 days after test completion.
(9 VAC 5-80-110 K)

Recordkeeping

14. Emission monitoring and recordkeeping not otherwise required by this permit shall consist of the following fuel consumption and operating data:
 - a. Amount of natural gas and woodwaste combusted in the gas and woodwaste-fired boilers on a monthly and annual basis. Fuel consumption is calculated as the sum of each consecutive 12 month period period.
 - b. The monthly and annual amounts, in tons of wood dust collected by the control devices of the dust collection system. Annual wood dust collected shall be calculated as the sum of each consecutive 12 month period.
 - c. Annual emissions calculations for the purpose of compliance certification with the terms of this permit, including emissions limitations. Hourly emissions shall be calculated by dividing the annual emissions calculated monthly as the sum of each consecutive 12 month period, by the annual hours of operation appropriate for the same.
 - d. The number of hours of operation of the Bigelow (01) and Cleaver Brooks (02) boilers.
 - e. The DEQ approved, pollutant-specific emission factors and the equations used to determine compliance with conditions 7, 8 and 9.
 - f. All stack tests, visible emission evaluations and performance evaluations.

The content of and format of such records shall be arranged with the Director, Southwest Regional

Office. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.) (9 VAC 5-50-50, 9 VAC 5-80-110 F and condition 35 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Woodworking Conditions (03)

Emission Control

15. Particulate emissions from the woodworking equipment (03) shall be controlled by a dust collection system including the following or equivalent; three Carter Day 484RF10 fabric filters, one Carter Day 144RJ96 fabric filter, two Pneumafil 13.5-460-12 fabric filters, and two Bruning and Federal 38C15-126A cyclones. The fabric filters and cyclones shall be provided with adequate access for inspection. An annual internal inspection shall be conducted on the cyclones by the permittee to insure structural integrity. Each Carter Day and Pneumafil fabric filter or equivalent, shall be equipped with devices to continuously measure the differential pressure across the fabric filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation at all times. The monitoring devices shall be checked weekly, with readings noted in a log. (9 VAC 5-50-30 F, 9 VAC 5-50-260, 9 VAC 5-80-110 C, 9 VAC 5-80-110 K and conditions 4 and 8 of NSR permit issued 10/28/99 (as amended 9/19/2000))
16. Fugitive particulate emissions from the collection, transfer and handling of wood waste shall be controlled by a completely enclosed transfer and collection system. (9 VAC 5-50-260, 9 VAC 5-80-110 C and condition 7 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Limitations

17. The throughput of wood to the woodworking operation shall not exceed 7,425,000 board feet per year, calculated monthly as the sum of the previous consecutive 12 months' throughput. (9 VAC 5-80-10 H, 9 VAC 5-80-110 A, 9 VAC 5-80-110 B and condition 12 of NSR permit issued 10/28/99 (as amended 9/19/2000))
18. Emissions from the operation of the woodworking equipment shall not exceed the limits specified below:

| | | | |
|--------------------|--------------|-------------|--------------|
| Particulate Matter | 0.01 gr/dscf | 1.35 lbs/hr | 5.91 tons/yr |
| PM-10 | | 1.35 lbs/hr | 5.91 tons/yr |

These emissions are derived from the estimated overall emission contribution from operating limits and emission factors. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated

in condition number 17, or as demonstrated by performance test. Annual emissions shall be calculated as the sum of each consecutive twelve (12) month period.

(9 VAC 5-50-260, 9 VAC 5-80-110 B and condition 21 of NSR permit issued 10/28/99 (as amended 9/19/2000))

19. Visible emissions from each fabric filter shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.

(9 VAC 5-50-260, 9 VAC 5-80-110 K and condition 24 of NSR permit issued 10/28/99 (as amended 9/19/2000))

20. Visible emissions from any fugitive emission points shall not exceed ten percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.

(9 VAC 5-50-260, 9 VAC 5-80-110 K and condition 29 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Monitoring

21. As part of the periodic monitoring requirement set forth in 9 VAC 5-80-110.E of State Regulations, visible emissions checks shall be performed on all baghouse exhausts and fugitive emissions points, for compliance with limits on visible emissions as specified in conditions 19 and 20 above. Visible checks shall be conducted at least daily during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions using 40 CFR 60 Appendix A, Method 22. If visible emissions are observed during these noted observations, or at any other time, visible emissions evaluations (VEEs) in accordance with 40 CFR 60 Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If any of the observations exceed 5% for baghouses or 10% for fugitive emission points, the VEE shall be conducted for a total of sixty (60) minutes. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.

(9 VAC 5-50-20 and 9 VAC 5-80-110 K)

Recordkeeping

22. Emission monitoring and recordkeeping not otherwise required by this permit shall consist of the following operating data:

- a. The monthly and annual throughput, in board feet, of wood processed by the woodworking equipment. Annual throughput shall be calculated as the sum of each consecutive 12 month period.

- b. Annual emissions calculations for the purpose of compliance certification with the terms of this permit, including emissions limitations, with annual emissions calculated monthly as the sum of each consecutive 12 month period. Records shall include the DEQ approved, pollutant-specific emission factors and the equations used to determine compliance with the annual limits in condition 18.
- c. All stack tests, visible emission evaluations and performance evaluations.

The content of and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-50-50, 9 VAC 5-80-110 F and condition 35 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Furniture Finishing Conditions (04)

Emission Control

- 23. Particulate emissions from the furniture finishing spray booths shall be controlled by filters and shall be provided with adequate access for inspection. The spray booths with airless spray guns shall be controlled by filters with a rated control efficiency of at least 93.8 percent.
(9 VAC 5-80-110 C)

Limitations

- 24. Emissions from spray booths applying sap stain shall not exceed the limits specified below for each type of stain:

| | |
|--------------------|------------|
| Particulate Matter | 5.74 lb/hr |
| PM-10 | 5.74 lb/hr |

(9 VAC 5-40-260 and 9 VAC 5-80-110 B)

- 25. Emissions from the application of washcoat shall not exceed the limits specified below:

| | |
|--------------------|------------|
| Particulate Matter | 5.74 lb/hr |
| PM-10 | 5.74 lb/hr |

(9 VAC 5-40-260 and 9 VAC 5-80-110 B)

- 26. Emissions from the application of filler and back spray shall not exceed the limits specified below for each:

| | |
|--------------------|------------|
| Particulate Matter | 5.74 lb/hr |
| PM-10 | 5.74 lb/hr |

(9 VAC 5-40-260 and 9 VAC 5-80-110 B)

31. As part of the periodic monitoring requirement set forth in 9 VAC 5-80-100 E of State Regulations, visible emissions checks shall be performed on the spray booth exhausts, for compliance with limits on visible emissions as specified in condition 30 above. Visible checks shall be conducted at least weekly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions using 40 CFR 60 Appendix A, Method 22. If visible emissions are observed during these weekly observations, or at any other time, visible emissions evaluations in accordance with 40 CFR 60 Appendix A, Method 9, shall be conducted on those units with visible emissions. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.
- (9 VAC 5-50-20 and 9 VAC 5-80-110 K)

Recordkeeping

32. Emission monitoring, recordkeeping and reporting not otherwise required by this permit shall consist of the following operating data:

A monthly and annual material balance including the throughput and emissions of particulate matter. Annual throughput shall be calculated as the sum of each consecutive 12 month period. Hourly emissions shall be calculated by dividing by the monthly operating hours for booths spraying each type of material limited in conditions 24 through 29 above. Records shall also include the pollutant-specific emission factors and the equations used to determine compliance with conditions 24 through 29, and records of any visible emission checks performed.

The content of and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-80-110 F)

Basecoat, Print and Topcoat Line (05)

Emission Control

33. Particulate emissions from the basecoat and print line's application stages shall be controlled by roller head applicators. The roller head applicators shall be provided with adequate access for inspection.
(9 VAC 5-80-110 C, 9 VAC 5-50-260 and condition 3 of NSR permit issued 10/28/99 (as amended 9/19/2000))
34. Particulate emissions from the basecoat, print and top coat line's spray booths shall be controlled by spray booth filters. The filters shall be provided with adequate access for inspection.
(9 VAC 5-80-110 C, 9 VAC 5-50-260 and condition 5 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Limitations

35. The throughput of Volatile Organic Compound (VOC) for the basecoat, print and top coat line shall not exceed 53.01 pounds per hour, 6510 pounds per month and 39.06 tons per year, calculated monthly as the sum of the previous consecutive 12 months' throughput. Any recovered cleaning materials shall not be counted against this throughput limitation.
(9 VAC 5-80-10 H, 9 VAC 5-80-110 A, 9 VAC 5-80-110 B and condition 13 of NSR permit dated 10/28/99 (as amended 9/19/2000))
36. Emissions from the operation of the basecoat, print and top coat line shall not exceed the limits specified below:

Volatile Organic
Compounds

53.01 lb/hr

39.06 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits and emission factors. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition number 35.

(9 VAC 5-50-260, 9 VAC 5-50-180, 9 VAC 5-80-110 B and condition 22 of NSR permit issued 10/28/99 (as amended 9/19/2000))

37. Visible emissions from the basecoat, print and top coat line's ovens and spray booths shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260, 9 VAC 5-80-110 K and condition 23 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Monitoring

38. As part of the periodic monitoring requirement set forth in 9 VAC 5-80-100.E of State Regulations, visible emissions checks shall be performed on the basecoat, print and top coat line's spray machines, ovens and spray booth for compliance with limits on visible emissions as specified in condition 37 above. Visible checks shall be conducted at least daily during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions using 40 CFR 60 Appendix A, Method 22. If visible emissions are observed during these daily observations, or at any other time, visible emissions evaluations in accordance with 40 CFR 60 Appendix A, Method 9, shall be conducted on those units with visible emissions. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.
(9 VAC 5-50-20 and 9 VAC 5-80-110 K)

Recordkeeping

39. Emission monitoring and recordkeeping not otherwise required by this permit shall consist of the following operating data:
 - a. A monthly and annual material balance including the throughput and emissions of VOC. Annual throughput and emissions shall be calculated as the sum of each consecutive 12 month period. The VOC content of coating material shall be determined by 40 CFR 60 Appendix A, Method 24, as an approved EPA test method. Information from material safety data sheets (MSDS) or certified product data sheets (CPDS) may be used, if the information contained therein is determined using approved EPA test methods.
 - b. All stack tests, visible emission evaluations and performance evaluations.

The content of and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall be available for inspection by the DEQ and shall be current for the most

recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-50-50, 9 VAC 5-80-110 F and condition 35 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Veneer Presses (06)

Limitations

40. The Fritz veneer press and the Burkleson Model 50-125 (Denmark) veneer press shall process Borden CR-583 with 0.4 weight percent free formaldehyde resin or equivalent. The total throughput of resin to the Fritz veneer press and the Burkleson veneer press shall not exceed 231 pounds per hour and 508.2 tons per year, calculated monthly as the sum of the previous consecutive 12 months' throughput.
(9 VAC 5-80-10 H, 9 VAC 5-80-110 A, 9 VAC 5-80-110 B and conditions 10 and 11 of NSR permit dated 10/28/99 (as amended 9/19/2000))
41. Total emissions from the operation of the Fritz and Burkleson (Denmark) veneer presses shall not exceed the limits specified below:

| | | |
|--------------|-------------|--------------|
| Formaldehyde | 0.17 lbs/hr | 0.18 tons/yr |
|--------------|-------------|--------------|

These emissions are derived from the estimated overall emission contribution from operating limits and emission factors. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition number 40.

(9 VAC 5-50-260, 9 VAC 5-50-180, 9 VAC 5-80-110 B and condition 17 of NSR permit issued 10/28/99 (as amended 9/19/2000))

42. Visible emissions from the Fritz veneer press exhaust shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260, 9 VAC 5-80-110 K and condition 25 of NSR permit issued 10/28/99 (as amended 9/19/2000))
43. Visible emissions from the Burkleson (Denmark) veneer press exhaust shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260, 9 VAC 5-80-110 K and condition 26 of NSR permit issued 10/28/99 (as amended 9/19/2000))

Monitoring

44. As part of the periodic monitoring requirement set forth in 9 VAC 5-80-100 E, visible emissions checks shall be performed on the Fritz and Burkleson veneer press exhausts for compliance with limits on visible emissions as specified in conditions 42 and 43 above. Visible checks shall be conducted at least daily during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions using 40 CFR 60 Appendix A, Method 22. If visible emissions are observed during these daily observations, or at any other time, visible emissions evaluations in accordance with 40 CFR 60 Appendix A, Method 9, shall be conducted on those units with visible

emissions. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.

(9 VAC 5-50-20 and 9 VAC 5-80-110 K)

Recordkeeping

45. Emission monitoring, recordkeeping and reporting not otherwise required by this permit shall consist of the following operating data:

The total throughput of resin to the Fritz and Burkleson (Denmark) veneer presses, calculated monthly as the sum of each consecutive 12 month period. The total hours of operation of the Fritz and Burkleson veneer presses, calculated monthly as the sum of each consecutive 12 month period, and annual and hourly emissions of formaldehyde. Hourly throughput and emissions shall be calculated by dividing by the monthly operating hours for the presses. Records shall also include the pollutant-specific emission factors and the equations used to determine compliance with condition 41, and records of any visible emission checks performed.

The content of and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)

(9 VAC 5-50-50, 9 VAC 5-80-110 F and condition 35 of NSR permit dated 10/28/99 (as amended 9/19/2000))

MACT Conditions

46. Except as specified in this permit, the facility is to be operated in compliance with Federal requirements under 40 CFR 63, Subpart JJ, and Subpart A as identified in Table 1 of subpart JJ.
(9 VAC 5-170-160, 40 CFR 63.800 and 40 CFR 63 Subpart A)

Emission Standard

47. Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits;
- a. For finishing operations use any of the following methods;
 - i. Achieve a weighted average VHAP content across all coatings of 1.0 lb VHAP/lb solids as applied;
 - ii. Use compliant finishing materials that meet the following specifications:

- (1) Each sealer and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids as applied;
 - (2) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
 - (3) Each thinner contains no more than 10.0 percent VHAP by weight except where excluded by (5) of this sub-section;
 - (4) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 lb VHAP/lb solids as applied;
 - (5) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight;
- iii. Use any combination of averaging, compliant coatings, and control device such that no greater than 1.0 lb of VHAP being emitted per lb of solids used;
- b. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied;
 - c. For contact adhesive operations use either of the following methods;
 - i. Compliant contact adhesives shall be used based on the following criteria;
 - (1) For aerosol adhesives, as well as hot melt, PVA, and urea-formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;
 - (2) For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 1.8 lb VHAP/lb solids as applied;
 - (3) For all other contact adhesives the VHAP content can be no more than 1.0 lb VHAP/lb solids as applied;
- (9 VAC 5-170-160 and 40 CFR 63.802)

Initial Compliance

48. Initial compliance with the VHAP emissions limits shall be determined as follows:
(See Conditions 54 and 55 for content and timing of report submissions and signature requirements)
 - a. For finishing operations when compliant finishing materials are being used to show initial compliance, the permittee shall submit an initial compliance status report stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition 47, are being used by the facility.

- b. For finishing operations when compliant finishing materials are being used to show initial compliance and the finishing materials are being applied using continuous coaters the permittee shall:
 - i. Submit an initial compliance status report stating that compliant finishing materials, as determined by the VHAP content of the finishing material in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or
 - ii. Submit an initial compliance status report stating that compliant finishing materials, as determined by the VHAP content of the finishing material in the reservoir, are being used; the viscosity of the finishing material in the reservoir is being monitored; and compliant thinners are being used. The permittee shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.
 - c. For finishing operations any of the following compliance methods may be used: 1) an averaging approach; 2) compliant coatings, as in Condition b; or 3) a combination of these methods.
 - d. For contact adhesive operations when compliant adhesives are being used to show initial compliance the permittee shall submit an initial compliance status report stating that compliant adhesives as stated in Condition 47 are being used.
 - e. For strippable spray booth coatings the permittee shall submit an initial compliance status report stating that compliant strippable spray booth coatings as stated in Condition 47 are being used by the affected source.
 - f. For work practice standards, in Condition 52, the permittee shall submit an initial compliance status report stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.
- (9 VAC 5-170-160 and 40 CFR 63.804.(f) & 40 CFR 63.804 (a)-(e))

Continuous Compliance

49. Continuous compliance with the VHAP emissions limits shall be determined as follows:
(See Condition 54 and 55 for content and timing of report submissions and signature requirements)
- a. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition 47, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.
 - b. For finishing operations when compliant coatings are being used to show continuous compliance and the coatings are being applied using continuous coaters the permittee shall demonstrate continuous compliance by either of the following:

- i. Use compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, use compliant thinners, and submit a compliance certification with the semiannual report which states that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - ii. Use compliant coatings, as determined by the VHAP content of the coating in the reservoir, use compliant thinners, maintain a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintain records of solvent additions, and submit a compliance certification with the semiannual report which states that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. The facility is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit, as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.
 - c. For contact adhesive operations when compliant adhesives are being used to show continuous compliance the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
 - d. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.
 - e. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the Administrator may require the permittee to modify the plan (see Condition 52.a.)
- (9 VAC 5-170-160 and 40 CFR 63.804.(g) & 40 CFR 63.8)

Copies of written notification referenced in items a and b should also be sent to the Southwest Regional Office.

(9 VAC 5-170-160 and 40 CFR 63.9(e) & (g))

Submittals

50. All submittals regarding 40 CFR 63, Subpart JJ to the Administrator shall be sent to the Southwest Regional Office and to EPA Region III at the following address:

U.S. EPA Region III
Air Protection Division (3AP00)
ATTN.: Wood Furniture NESHAP Coordinator
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-170-160 and 40 CFR 63.13)

Operation and Maintenance

51. The permittee shall meet the following operation and maintenance requirements:
- a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.
 - b. Malfunctions shall be corrected as soon as practicable after their occurrence.
 - c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
 - d. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(9 VAC 5-170-160 and 40 CFR 63.6(e))

Work Practice Standards

52. The permittee shall develop and implement the following work practice standards:
- a. Work practice implementation plan - The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing operations and addresses each of the work practice standards presented in Conditions b. through l. that follow. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in §63.803 of Subpart JJ or that the plan does not include sufficient mechanisms for ensuring that the work

practice standards are being implemented, the Administrator may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

- b. Operator training course - The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment in these operations, or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the compliance date. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
 - i. A list of all current personnel by name and job description that are required to be trained;
 - ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- c. Inspection and maintenance plan - The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
 - i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
 - ii. An inspection schedule;
 - iii. Methods for documenting the date and results of each inspection and any repairs that were made;
 - iv. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (1) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

- d. Cleaning and washoff solvent accounting system - The permittee shall develop an organic HAP solvent accounting form to record:
 - i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in §63.801 of Subpart JJ;
 - ii. The number of pieces washed off, and the reason for the washoff; and
 - iii. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- e. Chemical composition of cleaning and washoff solvents - The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ (see attached), in concentrations subject to MSDS reporting as required by OSHA.
- f. Spray booth cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- g. Storage requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- h. Application equipment requirements - The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - ii. For touchup and repair under the following conditions:
 - (1) The touchup and repair occurs after completion of the finishing operation; or
 - (2) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - iii. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - iv. When emissions from the finishing application station are directed to a control device;

- v. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
- vi. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:
 - (1) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - (2) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- i. Line cleaning - The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- j. Gun cleaning - The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- k. Washoff operations - The permittee shall control emissions from washoff operations by:
 - i. Using normally closed tanks for washoff; and
 - ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
- l. Formulation assessment plan for finishing operations - The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
 - i. Identifies VHAP from the list presented in Table 5 of Subpart JJ (see attached) that are being used in finishing operations;
 - ii. Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by §63.803 (l)(2). For VHAPs that do not have a baseline, one will be established according to Condition vi. below.

- iii. Tracks the annual usage of each VHAP identified that is present in amounts subject to MSDS reporting as required by OSHA.
- iv. If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the Southwest Regional Office and/or the Administrator that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
 - (1) The exceedance is no more than 15.0 percent above the baseline level;
 - (2) Usage of the VHAP is below the de minimis level presented in Table 5 for that VHAP;
 - (3) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
 - (4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.
- v. If none of the explanations listed in Condition iv. above are the reason for the increase, the permittee shall confer with the Southwest Regional Office and/or the Administrator to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the Southwest Regional Office and/or the Administrator and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- vi. If the facility uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to the Southwest Regional Office and/or the Administrator that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in Condition iv. above, the affected source shall follow the procedures established in Condition v. above.

(9 VAC 5-170-160 and 40 CFR 63.803(a)-(l))

Recordkeeping

53. The permittee shall maintain records of the following:

- a. For emission limit purposes the permittee shall maintain the following:
 - i. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Subpart JJ,
 - ii. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Subpart JJ; and
 - iii. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Subpart JJ.
- b. Following the continuous coating operations, where viscosity is being used to determine compliance, the permittee shall maintain the records required by Condition a above as well as the following:
 - i. Solvent and coating additions to the continuous coater reservoir;
 - ii. Viscosity measurements; and
 - iii. Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
- c. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - i. Records demonstrating that the operator training program required by Condition 52.b. is in place;
 - ii. Records collected in accordance with the inspection and maintenance plan required by Condition 52.c.;
 - iii. Records associated with the cleaning solvent accounting system required by Condition 52.d.;
 - iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period required by Condition 52.h.;
 - v. Records associated with the formulation assessment plan required by Condition 52.i.; and
 - vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- d. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following the compliance date.

- e. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.
- f. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(9 VAC 5-170-160 and 40 CFR 63.806 & 63.10(b)(1))

Notification of Compliance

54. Each time a notification of compliance status is required, the permittee shall submit to the Southwest Regional Office and/or the Administrator a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with Subpart JJ. The notification shall list:

- a. The methods that were used to determine compliance;
- b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
- c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
- d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;
- e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions data generated for this notification);
- f. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
- g. A statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in this permit.

(9 VAC 5-170-160 and 40 CFR 63.9(h))

Reporting

55. Reporting not otherwise required by this permit shall consist of the following:

- a. The permittee when demonstrating initial compliance shall submit the compliance status report required by §63.9(h) and Condition 54 no later than 60 days after the compliance date. The report shall include the information required by Condition 48.
 - b. The permittee when demonstrating continuous compliance shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
 - i. The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
 - ii. Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
 - iii. The semiannual reports shall include the information required by Condition 49, a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.
 - iv. The frequency of the reports required by Condition b. above shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.
 - c. The permittee, when required to provide a written notification by Condition 52.i.iv. for exceedance of a baseline level [§63.803(l)(4)], shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.
- (9 VAC 5-170-160 and 40 CFR 63.807 & 63.10(d))

Other Conditions

Visible Emission Standard

56. Unless otherwise specified in this permit, visible emissions from the any emission unit at this facility shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except for one six-minute period in any hour of not more than 60% opacity. This condition applies at all times except during startup, shutdown and malfunction. The details of the tests are to be arranged with the Director, Southwest Regional Office.
- (9 VAC 5-40-80 and 9 VAC 5-80-110 A)

Fugitive Dust/Emission Standard

57. During the operation of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited, to the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.

- b. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
- d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and
- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-80-110 A)

Emission Tests

58. Upon request of the Department, the permittee shall conduct emission tests in accordance with procedures approved by the Department and provide, or cause to be provided, emission testing facilities as follows:
- Sampling ports adequate for test methods applicable to such source.
 - Safe sampling platforms.
 - Safe access to sampling platforms.
 - Utilities for sampling and testing equipment.

Sampling ports, platforms and safe access shall be provided for the Bigelow and Cleaver Brooks boiler stacks.

(9 VAC 5-40-30 F)

General Conditions

Circumvention

59. No owner or other person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air pollutants emitted, conceals or dilutes an emission of air pollutants which would otherwise violate State Regulations. Such concealment includes, but is not limited to, 1) the use of gaseous diluents to achieve compliance with a visible emissions standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere, or 2) the piecemeal carrying-out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size. This section does not prohibit the construction of a stack.

(9 VAC 5-20-70)

Good Air Pollution Control Practice

60. To the extent practicable, the permittee shall at all times, including periods of start-up, shutdown and malfunction, maintain and operate the source including associated air pollution control equipment, if any, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. Excess emissions shall be reported and records maintained in accordance with the provisions of 9 VAC 5-20-180.
(9 VAC 5-20-180, 9 VAC 5-40-20 and 9 VAC 5-50-20)

Duty to Supplement or Correct Application

61. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. An applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E and 9 VAC 5-80-110 M)

Submissions Certification

62. Any application form, report, compliance certification, or other document required to be submitted to the DEQ shall be signed by a responsible official.
(9 VAC 5-80-80 G and 9 VAC 5-80-110 K)

Permit Duration and Application Shield

63. This permit shall become invalid five years from the date of issuance, which is noted on Page 1 of this permit. The permittee shall submit an application for renewal of this permit no earlier than 18 months and no later than six months prior to the date of expiration of this permit. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the DEQ on the renewal application.
(9 VAC 5-80-110 D and 9 VAC 5-80-80 F)

Severability

64. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G)

Duty to Comply

65. The permittee shall comply with all conditions of the permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
(9 VAC 5-80-110 G and 9 VAC 5-80-260 A)

Need to Halt or Reduce Activity Not a Defense

66. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (9 VAC 5-80-110 G)

Permit Action for Cause

67. The permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- a. This permit will be reopened and revised by the DEQ prior to expiration due to the following causes:
 - i. If additional applicable federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire.
 - ii. If the Board or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - iii. If the Administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
 - iv. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date of this permit.
 - b. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
 - c. Reopenings shall not be initiated before a notice of such intent is provided to the source by the Board at least 30 days in advance of the date that the permit is to be reopened, except that the Board may provide a shorter time period in the case of an emergency.
 - d. If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit pursuant to 9 VAC 5-80-240 A, the Administrator shall notify the Board and the permittee of such finding in writing. Following such notification the procedures as listed in 9 VAC 5-80-240 D shall be followed.
 - e. A permit may be revoked or terminated prior to its expiration date if the owner does any of the following:

- i. Knowingly makes material misstatements in the permit application or any amendments thereto.
- ii. Violates, fails, neglects or refuses to comply with (i) the terms or conditions of the permit, (ii) any applicable requirements, or (iii) the applicable provisions of Rule 8-5.

The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination stated above for any other violations of the regulations.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260)

Property Rights

68. The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G)

Duty to Submit Information

69. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G)

Duty to Pay Permit Fees

70. The permittee shall pay a permit fee as established in 9 VAC 5-80-330 of the State Regulations.
(9 VAC 5-80-110 H)

Emissions Trading

71. No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit.
(9 VAC 5-80-110 I)

Inspection and Entry Requirements

72. Upon presentation of credentials and other documents as may be required by law, the owner shall allow the Board to perform the following:
 - a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
(9 VAC 5-80-110 K, 9 VAC 5-80-260 E, and 9 VAC 5-170-130)

Compliance Schedule

73. The permittee shall comply with the compliance schedule as follows:

- a. For applicable requirements with which the source is in compliance the permittee will continue to comply with such requirements.
- b. For applicable requirements that will become effective during the permit term the permittee will meet such requirements on a timely basis.
(9 VAC 5-80-110 K and 9 VAC 5-80-90 I)

Annual Compliance Certification

74. Exclusive of any reporting required to assure compliance with the terms and conditions of this permit, the permittee shall submit a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, no later than March 1 of each calendar year. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, addressing the time period of January 1 to December 31.

- a. The compliance certification shall include the following:
 - i. The permit term or condition that is the basis of the certification;
 - ii. The current compliance status;
 - iii. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
 - iv. The methods, consistent with 9 VAC 5-80-110 E, used for determining compliance, currently and over the reporting period; and
 - v. Such other facts as the Board may require to determine the compliance status of the source.
- b. All compliance certifications shall be submitted to the DEQ and to the EPA Administrator.

Clean Air Act Title V Compliance Certification (3AP00)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- c. Such additional requirements as may be specified pursuant to § 114(a)(3) and § 504(b) of the federal Clean Air Act.
(9 VAC 5-80-110 K)

Federal Enforceability

- 75. All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the federal Clean Air Act.
(9 VAC 5-80-110 N)

Accidental Release Prevention

- 76. If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

Stratospheric Ozone Protection

- 77. If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Permit Shield

- 78. The permit shield provides that:
 - a. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements in effect as of the date of permit issuance and as specifically identified in the permit. The permit shield shall cover only the applicable requirements that are covered by terms and conditions of the permit, and
 - b. Nothing in 9 VAC 5-80-140 or in this permit shall alter or affect the following:
 - i. The provisions of § 303 of the federal Clean Air Act (emergency orders), including the authority of the Administrator under that section.
 - ii. The liability of an owner for any violation of applicable requirements prior to or at the time of permit issuance.
 - iii. The ability to obtain information from a source by the (1) Administrator pursuant to § 114 of the federal Clean Air Act (inspections, monitoring, and entry); (2) Board pursuant to § 10.1-1314 or § 10.1-1315 of the Virginia Air Pollution Control Law; or (3) department pursuant to § 10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

Transfer of Permit

79. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

Changes to Permit

80. Changes to emissions units that pertain to applicable federal requirements at a source with a permit issued shall be made as specified under 9 VAC 5-80-190 B through D and 9 VAC 5-80-200 through 9 VAC 5-80-240. Changes to emissions units that pertain to applicable state requirements at a source with a permit issued shall be made as specified under 9 VAC 5-80-190 E.
(9 VAC 5-80-190 A)

Malfunction as an affirmative defense

81. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions below are met.
- a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, telegraph, or any other method that allows the permittee to comply with the deadline. The notice fulfills the requirement of 9 VAC 5-80-110 F.2.b. to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.

In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source
(9 VAC 5-80-250)

Permit Deviation Reporting

82. The permittee shall notify the Director, Southwest Regional Office, within four daytime business hours of any deviations which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the occurrence, the permittee shall provide a written statement explaining the problem, any corrective actions or preventive measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semiannual compliance monitoring report required by condition 55.b. above or in the certification of compliance with permit terms and conditions pursuant to condition 74 of this permit. The semiannual reports shall include all deviations from permit requirements for the time period included in the report.
- a. For purposes of this permit, deviations include, but are not limited to:
- i. Exceedance of emissions limitations or operational restrictions;
 - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- b. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semiannual reporting period.”
(9 VAC 5-80-110 F and 9 VAC 5-20-180 C)

Permit on Site

83. Within five days after receipt of the issued permit, the applicant shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to the Board upon request.
(9 VAC 5-80-150 E)

Summary - Permitted Equipment, Terms, and Conditions

| Emission Unit ID | Pollutant Emitted | Emissions Limit / Work Practice Standard | | Regulations | Control Equipment or Method Conditions | Testing Requirement Conditions | Monitoring Requirement Conditions | Record-keeping Requirement Conditions | Reporting Requirement Conditions |
|------------------------|---|---|---|---|---|--------------------------------|-----------------------------------|---------------------------------------|----------------------------------|
| Fuel Burning Equipment | | | | | | | | | |
| 01 | PM PM-10 NO ₂ CO VOC SO ₂ Hg Ni As Cd Cr Cu V Se Be aldehydes Visible emissions | 9.30 lb/hr 1.90 lb/hr 21.70 lb/hr 10.70 lb/hr 3.80 lb/hr 48.40 lb/hr 0.0006 lb/hr 0.0234 lb/hr 0.0095 lb/hr 0.0011 lb/hr 0.0324 lb/hr 0.0211 lb/hr 0.0021 lb/hr 0.0030 lb/hr 0.0016 lb/hr 0.1444 lb/hr | 7.20 tons/yr 2.90 tons/yr 12.60 tons/yr 15.80 tons/yr 4.30 tons/yr 23.90 tons/yr 0.0003 tons/yr 0.0113 tons/yr 0.0046 tons/yr 0.0005 tons/yr 0.0156 tons/yr 0.0102 tons/yr 0.0010 tons/yr 0.0014 tons/yr 0.0008 tons/yr 0.1617 tons/yr | 9 VAC 5-50-20 9 VAC 5-50-50 9 VAC 5-50-260 9 VAC 5-50-180 9 VAC 5-80-10 9 VAC 5-80-110 B 9 VAC 5-80-110 C 9 VAC 5-80-110 F 9 VAC 5-80-110 K | Two multicyclones in series (CD01) Condition 3 | Condition 13 | Conditions 12 and 14 | Conditions 12 and 14 | Condition 74 and 82 |
| | | Consume no more than 6000 tons/yr of woodwaste, calculated monthly. | | | | | | | |
| 02 | CO NO ₂ SO ₂ Visible emissions | 1.05 lb/hr 4.18 lb/hr 15.00 lb/hr | 0.90 tons/yr 3.50 tons/yr 12.57 tons/yr | 9 VAC 5-50-20 9 VAC 5-50-50 9 VAC 5-50-260 9 VAC 5-80-10 9 VAC 5-80-110 B 9 VAC 5-50-110 F 9 VAC 5-80-110 K | | | Conditions 12 and 14 | Conditions 12 and 14 | Condition 74 and 82 |
| | | Consume no more than 48.8 x 10 ⁶ ft ³ /yr of natural gas, calculated monthly. | | | | | | | |

| Emission Unit ID | Pollutant Emitted | Emissions Limit / Work Practice Standard | Regulations | Control Equipment or Method Conditions | Testing Requirement Conditions | Monitoring Requirement Conditions | Record-keeping Requirement Conditions | Reporting Requirement Conditions |
|---------------------------------------|--------------------------------------|--|---|--|--------------------------------|-----------------------------------|---------------------------------------|----------------------------------|
| Woodworking Operations | | | | | | | | |
| 03 | PM PM-10 Visible emissions | 0.01 gr/dscf 1.35 lb/hr 5.91 tons/yr 1.35 lb/hr 5.91 tons/yr 5% opacity for each baghouse 10% for fugitive emission points | 9 VAC 5-50-20 9 VAC 5-50-30 F 9 VAC 5-50-260 9 VAC 5-80-10 H 9 VAC 5-80-110 A 9 VAC 5-80-110 B 9 VAC 5-80-110 C 9 VAC 5-80-110 F 9 VAC 5-80-110 K | Four Carter Day and two Pneumafill baghouses and two Bruning and Federal cyclones CD02-CD09 Condition 15 | | Conditions 21 and 22 | Conditions 21 and 22 | Condition 74 and 82 |
| Furniture Finishing Operations | | | | | | | | |
| 04 | PM PM-10 Visible emissions | 5.74 lb/hr each for application of basecoat, enamel stains, washcoat, sealer and topcoat 20% opacity | 9 VAC 5-40-80 9 VAC 5-40-260 9 VAC 5-50-20 9 VAC 5-80-110 B 9 VAC 5-80-110 C 9 VAC 5-80-110 F 9 VAC 5-80-110 K | Filters Condition 23 | | Conditions 31 and 32 | Conditions 31 and 32 | Condition 74 and 82 |
| 05 | VOC Visible emissions | 53.01 lb/hr 39.06 tons/yr 20% opacity Throughput of VOC for the basecoat, print and top coat line shall not exceed 53.01 lb/hr, 6510 lb/month and 39.06 tons/yr, calculated monthly. | 9 VAC 5-50-20 9 VAC 5-50-50 9 VAC 5-50-180 9 VAC 5-50-260 9 VAC 5-80-10 H 9 VAC 5-80-110 A 9 VAC 5-80-110 B 9 VAC 5-80-110 C 9 VAC 5-80-110 F 9 VAC 5-80-110 K | Roller head applicators and cellulose filters for spray booths. Conditions 32 and 33 | | Conditions 38 and 39 | Conditions 38 and 39 | Condition 74 and 82 |
| | | | | | | | | |

| Emission Unit ID | Pollutant Emitted | Emissions Limit / Work Practice Standard | Regulations | Control Equipment or Method Conditions | Testing Requirement Conditions | Monitoring Requirement Conditions | Record-keeping Requirement Conditions | Reporting Requirement Conditions |
|--|--|--|---|--|--------------------------------|-----------------------------------|---------------------------------------|--|
| Veneer Presses | | | | | | | | |
| 06 | HCHO (Formaldehyde) Visible Emissions | 0.17 lb/hr 0.18 tons/yr Veneer presses shall process resin with no more than 0.4 wt.% free formaldehyde. Throughput of resin to the presses shall not exceed 231 lb/hr and 508.2 tons/yr, calculated monthly. 5% opacity | 9 VAC 5-50-20 9 VAC 5-50-50 9 VAC 5-50-180 9 VAC 5-50-260 9 VAC 5-80-10 H 9 VAC 5-80-110 A 9 VAC 5-80-110 B 9 VAC 5-80-110 F 9 VAC 5-80-110 K | | | Condition 44 and 45 | Condition 44 and 45 | Condition 74 and 82 |
| Facility-wide MACT Conditions | | | | | | | | |
| | Volatile HAPs (VHAPs) | Use compliant coatings & adhesives < 1.0 lb VHAPs/lb solids & Thinner < 10% HAPs | 40 CFR 63 Subpart JJ and 40 CFR 63 Subpart A | | | Conditions 48, 49 and 52 | Conditions 48, 49, 52 and 53 | Conditions 48, 49, 50, 54, 55, 74 and 82 |
| Insignificant Equipment or Activities | | | | | | | | |
| 07 | Visible Emissions | 9 VAC 5-40-80 | | | | | | |
| 08 | Visible Emissions | 9 VAC 5-40-80 | | | | | | |
| 09 | Visible Emissions | 9 VAC 5-40-80 | | | | | | |
| 10 | Visible Emissions | 9 VAC 5-40-80 9 VAC 5-40-260 | | | | | | |

| Emission Unit ID | Pollutant Emitted | Emissions Limit / Work Practice Standard | Regulations | Control Equipment or Method Conditions | Testing Requirement Conditions | Monitoring Requirement Conditions | Record-keeping Requirement Conditions | Reporting Requirement Conditions |
|-------------------------|--------------------------|---|--------------------|---|---------------------------------------|--|--|---|
| 11 | Visible Emissions | 9 VAC 5-40-80 9 VAC 5-40-260 | | | | | | |

SOURCE TESTING REPORT FORMAT

Cover

1. Plant name and location
2. Units tested at source (indicate Ref. No. used by source in permit or registration)
3. Tester; name, address and report date

Certification

1. Signed by team leader / certified observer (include certification date)
- * 2. Signed by reviewer

Introduction

1. Test purpose
2. Test location, type of process
3. Test dates
- * 4. Pollutants tested
5. Test methods used
6. Observers' names (industry and agency)
7. Any other important background information

Summary of Results

1. Pollutant emission results / visible emissions summary
2. Input during test vs. rated capacity
3. Allowable emissions
- * 4. Description of collected samples, to include audits when applicable
5. Discussion of errors, both real and apparent

Source Operation

1. Description of process and control devices
2. Process and control equipment flow diagram
3. Process and control equipment data

* Sampling and Analysis Procedures

1. Sampling port location and dimensioned cross section
2. Sampling point description
3. Sampling train description
4. Brief description of sampling procedures with discussion of deviations from standard methods
5. Brief description of analytical procedures with discussion of deviation from standard methods

Appendix

- * 1. Process data and emission results example calculations
2. Raw field data
- * 3. Laboratory reports
4. Raw production data
- * 5. Calibration procedures and results
6. Project participants and titles
7. Related correspondence
8. Standard procedures

* Not applicable to visible emission evaluations.

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